

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**STEVEN NOVIA**, individually and on behalf  
of all others similarly situated,

*Plaintiff,*

v.

**MOBIZ INC.  
AND  
HARRIS BROTHERS  
OF MICHIGAN, INC.**

*Defendants.*

Case No. 1:25-cv-11036

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**DECLARATION OF STEVEN NOVIA**

1. My name is Steven Novia. I am over 18 years old. I can testify competently to the undersigned statements.
2. My telephone number 617-XXX-XXXX is on the National Do-Not-Call Registry.
3. I am the user of 617-XXX-XXXX.
4. The 617-XXX-XXXX number is registered in my name and I am the subscriber of record.
5. I submit this Declaration to demonstrate why the lack of accurate caller ID information harmed me.
6. In sum, the lack of accurate caller ID information transmitted along with text messages undermines trust in the source of the text messages I receive and my ability to identify those calling me illegally.

7. For example, here, the text message showed up as a number instead of being associated with a name, which prohibits me from knowing who is texting me at a glance and requires me to open the message, which is an additional step that wastes my time and energy.

8. By contrast, accurate caller ID information would have allowed me to view the sender, including while my phone screen was locked, and ascertain that the message was not important and prioritize my daily tasks accordingly.

9. And, in order to associate the telephone number with a name for each repeated message that was sent to me (as opposed to memorizing a spam telephone number), I would be forced to add the number to my contacts, which simply adds to clutter in my contacts book and is an additional step to take for messages I don't even want and want to ignore.

10. As reproduced in the Complaint, each of the text messages I received came from 810-208-1763 and did not transmit an accurate caller ID name.

11. Because the caller ID information did not identify the caller by name, I had no way to know who was attempting to solicit me, whom to ask to stop, or whom to sue to protect my rights.

12. Indeed, it was only through an email to Harris Brothers that I learned that they did not send the text messages themselves but rather hired MoBiz to send them, and MoBiz was not listed anywhere in the messages or caller ID.

13. That e-mail was the first time I learned that MoBiz was the party actually responsible for sending and initiating the messages.

14. MoBiz was the actual initiator and sender of the messages but did not identify itself anywhere.

15. Thus, in addition to making it more difficult to view the sender of the text messages at a glance, the inaccurate caller ID information thus deprived me of the key fact of MoBiz's identity that I needed to exercise my statutory rights, including naming an additional defendant without further investigation.

16. The provision of accurate caller ID information would also have allowed me to send a do-not-call request to MoBiz to indicate that I did not desire to receive text messages they sent on behalf of any of their customers.

17. To be clear, the lack of accurate caller ID name information harmed me, among other reasons, because it made it difficult and impossible to identify who was texting me.

18. To be clear, I do nothing to precipitate the illegal calls and messages which are placed to me. I do not want these communications, but they continue to be placed to me. They are highly annoying and disruptive.

19. I was harmed and injured by the Defendants' messages, including the lack of any accurate caller ID information. I was deprived of legitimate use of network resources, bandwidth, power, and storage space and my privacy was improperly invaded. Additionally, my statutory rights as recognized by the TCPA were violated. Illegal calls are frustrating, obnoxious, and annoying. They are a nuisance and disturbed my solitude.

20. My number is on the Do-Not-Call Registry, and I did not provide any consent for anyone to send the calls at issue to me.

21. I do not and have never welcomed nor wanted illegal calls or text messages and do nothing to receive or deserve them. My injury was done completely at the hands of Defendants, who took it upon themselves to text me in violation of the TCPA.

22. I brought this case as a class action because I know that there are likely thousands more people in a similar situation such as myself, having received messages from Defendants without their consent.

23. I brought this case not for personal motives or financial gain, but as a bulwark for the rights of consumers against illegal telemarketing. I was not paid by anyone to do so.

**I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.**

**Executed this 17th day of July 2025, in the United States of America,**

A handwritten signature in cursive script, appearing to read "Steven Novia", is written over a horizontal line.

**Steven Novia**